



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 10, 2025

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*,
No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I represent Defendants (the "government") in the above-referenced FOIA action and write respectfully on behalf of all parties in the above-referenced FOIA action to provide a status update.

As noted in the last status report, Plaintiff has reviewed all of the draft Vaughn indexes provided by the government and determined that it will not raise any additional challenges to the government's asserted FOIA exemptions. Therefore, the only remaining issue is attorneys' fees and costs. Plaintiff is still working to finalize a demand and supporting documentation for the government's consideration. To allow the parties more time to discuss a potential resolution of this issue without the Court's intervention, the parties respectfully propose to file a further status update by May 5, 2025.

I thank the Court for its attention to this matter.

Respectfully,

MATTHEW PODOLSKY
Acting United States Attorney

By: /s/ Peter Aronoff
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cc: Counsel for Plaintiff (by ECF)